

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

UNITED STATES OF AMERICA :

- v. - :

SUPERSEDING INDICTMENT

SAADAH MASOUD, :

S1 22 Cr. 359 (DLC)

Defendant. :

- - - - - x

COUNT ONE

(Hate Crime Act)

The Grand Jury charges:

1. On or about April 20, 2022, in the Southern District of New York, SAADAH MASOUD, the defendant, did willfully cause bodily injury to a victim ("Victim-1") because of Victim-1's actual and perceived religion, and Victim-1's actual and perceived national origin, to wit, MASOUD repeatedly punched Victim-1 in the head and face, and dragged Victim-1 across a sidewalk, while Victim-1 was wearing an Israeli flag, causing bodily injury to Victim-1.

(Title 18, United States Code, Section
249(a)(1)(A).)

COUNT TWO

(Conspiracy to Commit Hate Crimes)

The Grand Jury further charges:

2. From at least in or about May 2021, up to and including at least in or about April 2022, in the Southern District of New York and elsewhere, SAADAH MASOUD, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, hate crime acts, in violation of Title 18, United States Code, Section 249(a)(1)(A).

3. It was a part and object of the conspiracy that SAADAH MASOUD, the defendant, and others known and unknown, would and did willfully cause bodily injury to multiple victims, because of the victims' actual and perceived religion, and the victims' actual and perceived national origin.

Overt Acts

4. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about April 20, 2022, MASOUD caused bodily injury to Victim-1 because of Victim-1's actual and perceived religion, and Victim-1's actual and perceived national origin, to wit, MASOUD repeatedly punched Victim-1 in the head and


face, and dragged Victim-1 across a sidewalk, while Victim-1 was wearing an Israeli flag, causing bodily injury to Victim-1.

b. On or about June 2, 2021, MASOUD and another individual and co-conspirator ("CC-1") caused bodily injury to a second victim ("Victim-2"), because of Victim-2's actual and perceived religion, and Victim-2's actual and perceived national origin, to wit, MASOUD and CC-1 approached Victim-2 while Victim-2 was wearing traditional clothing associated with the Jewish religion, including a yarmulke. MASOUD then verbally threatened Victim-2, and CC-1 punched Victim-2.

c. On or about May 20, 2021, MASOUD caused bodily injury to a third victim ("Victim-3") because of Victim-3's actual and perceived religion, and Victim-3's actual and perceived national origin, to wit, MASOUD punched Victim-3 in the face, while Victim-3 was wearing a Star of David necklace, causing bodily injury to Victim-3.

(Title 18, United States Code, Section 371.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney

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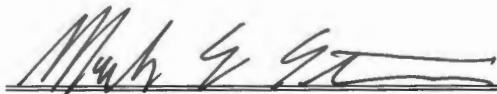
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(18 U.S.C. §§ 249(a)(1)(A) and 371.)

DAMIAN WILLIAMS

United States Attorney.

A TRUE BILL



Foreperson.

10/6/22 SUPERSEDING INDICTMENT FILED.

~~CHIEF ASSISTANT ATTORNEY GENERAL~~

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USMJ

GORENSTEIN